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12	and AMAZON TECHNOLOGIES, INC.		
13	UNITED STATES DISTRICT COURT		
14	NORTHERN DISTRICT OF CALIFORNIA		
15	AMAZON.COM, INC., a Delaware corporation, and AMAZON TECHNOLOGIES,	Case No. 3:23-cv-0	
16	INC., a Nevada corporation,	DECLARATION IN SUPPORT OF	OF COURTNEY SAKRE PLAINTIFFS
17	Plaintiffs,		INC. & AMAZON S, INC.'S MOTION FOR
18	v.	DEFAULT JUDG DEFENDANTS (1	MENT AGAINST ) VTLOGODESIGN,
19	UMER WASIM, et al.,		FILIATES, INC.; (3) ALI
20	Defendants.	SOLUTIONS LLC	C; (6) MEHWASH STOP COMPUTER
21		SERVICES LLC;	(7) MUHAMMAD (8) TECHTURE INC.; (9)
22		<b>MUHAMMAD M</b>	ÙĎASSAR ANWAR; (10) T LLC; (11) ASHHAR
23		<b>RAWOOF</b> ; (12) S	MART STARTUP ) MUHAMMAD USMAN
24		KHAN; (14) YASI	
25		(16) MAVIA NIZA	AM
26 27		Hearing Date: Time: Location:	December 10, 2024 2:00 pm San Francisco Courtroom 09, 19th Flr
28		Complaint filed:	October 30, 2023
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I, Courtney Sakre, declare as follows:

- 1. I am over the age of eighteen and am competent to testify as to the matters set forth herein. I have personal knowledge of the facts in this Declaration, and base this Declaration on my personal knowledge.
- 2. I make this Declaration in support of Plaintiffs' Motion for Default Judgment
  Pursuant to Federal Rule of Civil Procedure 55(b) as to Defendants: (1) VTLogodesign, Inc.; (2)
  MK Affiliates, Inc.; (3) Ali Alam; (4) Dynamic Digital Solutions LLC; (5) Mehwash Munir; (6)
  One Stop Computer Services LLC; (7) Muhammad Zubair Khan; (8) Techture Inc.;
  (9) Muhammad Mudassar Anwar; (10) Tech Drive Pvt LLC; (11) Ashhar Rawoof; (12) Smart
  Startup Solutions, LLC.; (13) Muhammad Usman Khan; (14) Yasir Agar; (15) Muhammad Shiraz
  Qureshi; and (16) Mavia Nizam ("Defendants"). The following facts are personally known by me
  to be true and, if called and sworn as a witness, I could and would competently testify as follows.
- 3. I am the Director of Risk and Operations for Books at Amazon and have worked in this role since 2023, and at Amazon since 2013.
- 4. Amazon offers the Kindle Direct Publishing ("KDP") service, which allows authors to self-publish books in print and digital formats for free and reach millions of readers in over a dozen Amazon marketplaces and 175 countries.
- 5. KDP has helped millions of authors reach new readers and pursue careers in self-publishing. KDP self-published authors have won numerous awards, including the Romance Writers of America RITA Award, the highest award of distinction in romance fiction.
- 6. In October 2023, more than 269,000 people followed Amazon's KDP Facebook page and more than 78,800 people followed Amazon's KDP X (formerly known as Twitter) account.
- 7. KDP authors control the rights to their books and can make changes to their books at any time. Authors can set up an eBook for publication within minutes, and within 72 hours the eBook can appear for sale on Amazon. When publishing, authors select a royalty plan which determines what percentage of the amounts earned from sales are paid to the author.

- 8. KDP is free and offers numerous services to authors. KDP offers a free program called KDP Select that allows authors to reach additional readers through the Kindle Unlimited subscription service, enables authors to take advantage of Amazon and Kindle promotions on their titles, and gives authors access to promotional tools such as free give-away days and time-based price promotions.
- 9. As of October 2023, the KDP Select Global Fund provided more than \$2.8 billion dollars in royalties to participants in KDP Select for their participation in Kindle Unlimited.
- 10. An author listing an eBook can gift a redemption code for a free copy, and can create a free Author Page. Additional related services that KDP offers for free include: providing an International Standard Book Number ("ISBN"), which is required to publish a paperback or hardcover book; tools for creating book covers, templates, front, body and back matter elements; and Kindle Create software, an interior formatting tool. KDP authors can enroll for free in an Expanded Distribution program, which makes paperbacks that are available on Amazon also available to other distributors, allowing booksellers and libraries to order them.
  - 11. Amazon also offers advertising for KDP books on a cost-per-click basis.
- 12. KDP advertises and operates the website at kdp.amazon.com. Attached hereto as **Exhibit A** is a true and correct screenshot of a portion of the kdp.amazon.com website captured on August 21, 2024.
- 13. A significant number of KDP customers reside in California, which is one of KDP's largest sales territories in the United States.

I declare under penalty of perjury under laws of the United States that the foregoing is true and correct. Executed this 12thday of September, 2024 in Charleston, South Carolina.



# **EXHIBIT A**



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